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VIA ECF

The Honourable Sarah L. Cave  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

4-29-2020  
Bail is modified as  
requested. SO  
ORDERED.

**RE: *United States v. Morris Toomer* 20 Cr. 132 (PAC)**  
Temporary Modification of Bail conditions

Dear Judge Cave:

I represent Mr. Morris Toomer in the above referenced matter. We write to respectfully request that the bail conditions set by Your Honour on February 26, 2020 be temporarily modified for Mr. Toomer to be able to attend his grandmother's funeral. Mr. Toomer's grandmother passed away from Covid-19 and the family will have a funeral and a burial service.

On Wednesday, April 29, 2020, there will be a viewing service at International Funeral Service 1761 Amsterdam Avenue, New York, NY 10031. Mr. Toomer has gotten permission from his pre-trial officer to attend the viewing service and return home by 7pm on April 29, 2020. Then, on April 30, 2020 the family will be burying his grandmother at George Washington Memorial Park Cemetery located at 234 Paramus Rd, Paramus, NJ 07652. They will meet at the funeral home in Manhattan at 8:30am and process to the cemetery in New Jersey. The burial service is scheduled to start at 9:30am at the cemetery. The Order setting the conditions of his bail restrict his travel to the Southern and Eastern Districts of New York. We are requesting that Your Honour please permit Mr. Toomer to travel to the District of New Jersey to attend his grandmother's burial at the George Washington Memorial Park Cemetery on April 30, 2020. The curfew that the pretrial officer already has in place is set for 6pm.

Mr. Toomer understands that should Your Honour permit him to attend his grandmother's burial on April 30, 2020, he is only permitted to travel to the District of New Jersey on that date only. After his grandmother's funeral, Mr. Toomer understands that he will resume compliance with the previously set conditions of his release.

For those reasons, Your Honour's immediate attention is appreciated.

Respectfully submitted,

Esere J. Onaodowan, Esq.

CC via email: AUSA Juliana Murry